

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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AT Venture Sales, LLC,

Case No.: 21-CV-2515 (KMM/ECW)

Plaintiff,

v.

**PLAINTIFF'S MOTION TO  
COMPEL**

Stork Craft Manufacturing, Inc.,  
and Stork Craft Manufacturing  
(USA), Inc.,

Defendants.

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Plaintiff AT Venture Sales, LLC moves the Court for an order granting Plaintiff's motion to compel the production of documents in response to Plaintiff's First Set of Requests for Production and amending the governing scheduling order.

Specifically, Plaintiff requests that the Court enter an order as follows:

1. Ordering Stork Craft to expeditiously and in good faith negotiate Atventure's proposed search terms, including by:
  - a. Providing Atventure with a hit-count report reflecting the number of unique documents generated by each of Atventure's proposed search terms within five business days;
  - b. Contemporaneously providing Atventure with a hit-count report reflecting the unique number of documents generated by Stork Craft's revised search terms; and
  - c. Promptly working with Atventure to reach agreed-upon search terms within 15 business days.
2. Ordering Stork Craft to timely produce documents responsive to Atventure's requests no later than 10 business days after agreement is reached on the search terms;

3. Extending all deadlines by an additional 120 days, subject to minor adjustments to accommodate the parties' or the Court's schedules;
4. Awarding Atventure its costs and reasonable attorneys' fees incurred in connection with meeting and conferring with Stork Craft on these issues and in connection with bringing this motion; and
5. Advising Stork Craft that failure to comply with the terms set forth in the Court's order will result in one or more additional sanctions available under Federal Rule of Civil Procedure 37(b), including, without limitation, additional monetary sanctions or dismissal of Stork Craft's claims and/or defenses.

This motion is based upon the files, records, declarations, pleadings, arguments of counsel, and proceedings herein, including but not limited to the memoranda and declaration(s) filed in support of this motion.

Dated: April 27, 2022

**ANTHONY OSTLUND  
LOUWAGIE DRESSEN &  
BOYLAN P.A.**

*s/ Ryan M. Lawrence*

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